



United States District Court  
Eastern District of California

Randall L. Dougherty, Sr., Individually and on behalf of the Estate  
of Randall B. Dougherty, Jr., Deceased; and Jolene Dougherty

Plaintiff(s)

Case Number: 2:24-cv-03002-DAD-SCR

V.

Target Corporation, et al.

Defendant(s)

APPLICATION FOR PRO HAC VICE  
AND PROPOSED ORDER

Pursuant to Local Rule 180(b)(2) of the United States District Court for the Eastern District of California,  
R. Clifton Merrell \_\_\_\_\_ hereby applies for permission to appear and participate  
as counsel in the above entitled action on behalf of the following party or parties:

Target Corporation, Empower Brands, LLC and Tristar Products, Inc.  
\_\_\_\_\_

On May 8, 2012 (date), I was admitted to practice and presently in good standing in the  
Supreme Court of Georgia (court). A certificate of good standing from that court is  
submitted in conjunction with this application. I have not been disbarred or formally censured by a court of  
record or by a state bar association; and there are not disciplinary proceedings against me.

☐ I have ☒ I have not concurrently or within the year preceding this application made a pro hac vice  
application to this court. (If you have made a pro hac vice application to this court within the last year, list  
the name and case number of each matter in which an application was made, the date of application and  
whether granted or denied.)  
\_\_\_\_\_  
\_\_\_\_\_

Date: September 30, 2025

Signature of Applicant: /s/ R. Clifton Merrell

**Pro Hac Vice Attorney**

Applicant's Name: R. Clifton Merrell

Law Firm Name: Greenberg Traurig, PA

Address: Terminus 200, 3333 Piedmont Road NE, Suite 2500

City: Atlanta State: GA Zip: 30305

Phone Number w/Area Code: (678) 553-2100

City and State of Residence: Atlanta, GA

Primary E-mail Address: merrellc@gtlaw.com

Secondary E-mail Address: NEF-PLPG@gtlaw.com

I hereby designate the following member of the Bar of this Court who is registered for ECF with whom the Court and opposing counsel may readily communicate regarding the conduct of the case and upon whom electronic notice shall also be served via the Court's ECF system:

Local Counsel's Name: Richard Reynaldo Tabura

Law Firm Name: Greenberg Traurig, LLP

Address: 400 Capitol Mall, Suite 2400

City: Sacramento State: CA Zip: 95814

Phone Number w/Area Code: (916) 442-1111 Bar # 298677

**ORDER**

The Pro Hac Vice Application is APPROVED. The Pro Hac Vice Attorney is DIRECTED to request filing access through PACER.

Dated: September 30, 2025

  
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JUDGE, U.S. DISTRICT COURT